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11 AGENCY TO THE INDUSTRY
12 URBAN-DEVELOPMENT AGENCY

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

SINCERE ORIENT COMMERICAL
CORPORATION, a California
corporation,

Plaintiff,

vs.

CITY OF INDUSTRY, SUCCESSOR
AGENCY TO THE INDUSTRY
URBAN-DEVELOPMENT AGENCY,
a California unit of local government;
FOX LUGGAGE, INC., a California
corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 2:17-cv-04755-PSG-RAO

**STIPULATION TO EXTEND TIME
FOR FILING RESPONSIVE
PLEADING**

**Pursuant to Fed. R. Civ. P. 6(b)(1)
and Local Rule 8-3**

TO ALL PARTIES AND TO THE HONORABLE COURT:

IT IS HEREBY STIPULATED by and between Plaintiff SINCERE ORIENT
COMMERICAL CORPORATION (“**Plaintiff**”) and Defendant SUCCESSOR
AGENCY TO THE INDUSTRY URBAN-DEVELOPMENT AGENCY
(erroneously named as the “CITY OF INDUSTRY, SUCCESSOR AGENCY TO
THE INDUSTRY URBAN-DEVELOPMENT AGENCY” hereafter,

1 “**Defendant**”), through their respective attorneys of record, as follows:

2 WHEREAS, Plaintiff filed its Complaint on June 27, 2017, and filed its First
3 Amended Complaint on September 15, 2017;

4 WHEREAS, Plaintiff served the Summons and First Amended Complaint on
5 Defendant on September 25, 2017;

6 WHEREAS, Defendant desires additional time to prepare and file its
7 responsive pleading(s) to the First Amended Complaint; and

8 WHEREAS, Plaintiff is willing to provide additional time for Defendant to
9 prepare and file its responsive pleading(s).

10 NOW, THEREFORE, BASED ON THE FOREGOING FACTS, THE
11 AFOREMENTIONED PARTIES HEREBY STIPULATE THAT:

12 1. Defendant’s last day to file its pleading(s) in response to the First
13 Amended Complaint on file in this matter is extended from October 16, 2017 to
14 November 15, 2017.

15 IT IS SO STIPULATED AND AGREED.

16 Dated: October 10, 2017

CASSO & SPARKS, LLP

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18 By: /s/ James M. Casso

19 JAMES M. CASSO
20 Attorneys for Defendant SUCCESSOR
21 AGENCY TO THE INDUSTRY
22 URBAN-DEVELOPMENT AGENCY
23 E-mail: jcasso@cassosparks.com

24 Dated: October 10, 2017

INHOUSE CO. LAW FIRM

25 By: /s/ Alexander Chen

26 ALEXANDER CHEN
27 Attorneys for Plaintiff SINCERE ORIENT
COMMERCIAL CORPORATION
E-mail: alexc@inhouseco.com

28 [SIGNATURE ATTESTATION APPEARS ON FOLLOWING PAGE]

Signature Attestation

Pursuant to Local Rule 5-4.3.4(a)(i), I hereby attest that the content of this document is acceptable to Alexander Chen, counsel for Plaintiff; and that I have obtained Mr. Chen's concurrence in this document's content, his authorization for its filing, and his authorization to affix his electronic signature to this document.

/s/ James M. Casso

JAMES M. CASSO

Attorneys for Defendant SUCCESSOR

AGENCY TO THE INDUSTRY

URBAN-DEVELOPMENT AGENCY

E-mail: jcasso@cassosparks.com

***SINCERE ORIENT COMMERCIAL CORPORATION VS. SUCCESSOR
AGENCY TO THE INDUSTRY URBAN-DEVELOPMENT AGENCY***

2:17-cv-04755-PSG-RAO

I am a citizen of the United States. My business address is 13200 Crossroads Parkway North, Suite 345, City of Industry, California 91746. I am employed in the County of Los Angeles where this service occurs. I am over the age of 18 years, and not a party to the within action.

On the date set forth below, according to ordinary business practice, I served the foregoing documents described as:

- 1. STIPULATION TO EXTEND TIME FOR FILING
RESPONSIVE PLEADING; AND**
- 2. [PROPOSED] ORDER EXTENDING TIME FOR FILING
RESPONSIVE PLEADING TO COMPLAINT BY NOT MORE
THAN 30 DAYS**

☒ (BY E-MAIL) On this date, I personally transmitted the foregoing document(s) via electronic mail to the e-mail address of the person below.

Alexander Chen, Esq. - alexc@inhouseco.com

☒ (BY MAIL) I am readily familiar with my employer's business practice for collection and processing of correspondence for mailing with the U.S. Postal Service, and that practice is that correspondence is deposited with the U.S. Postal Service the same day as the day of collection in the ordinary course of business. On this date, I placed the document(s) in envelopes addressed to the person below and sealed and placed the envelopes for collection and mailing following ordinary business practices.

**Alexander Chen, Esq.
Inhouse Co Law Firm
7700 Irvine Center Dr., Suite 800
Irvine, CA 92618**

☐ (BY PERSONAL SERVICE) On this date, I delivered by hand envelope(s) containing the document(s) to the person(s) on the attached service list.

☐ (BY OVERNIGHT DELIVERY) On this date, I placed the documents in envelope(s) addressed to the person(s) on the attached service list, and caused those envelope(s) to be delivered to an overnight delivery carrier,

PROOF OF SERVICE

1 with delivery fees provided for, for next-business-day delivery to whom it is
2 to be served.

3 I declare under penalty of perjury under the laws of the State of California that
4 the foregoing is true and correct.

5 Executed on October 11, 2017, at City of Industry, California.

6 

7 Brandi Magana